

# EXHIBIT C

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION

Case No.: 1:17-md-2804-DAP

This document relates to:

All Cases

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AUDIO TRANSCRIPTION

10/8/18 Telephonic Conference

Transcribed at:

Veritext - Cleveland

1100 Superior Avenue, Suite 1820

Cleveland, Ohio

Buster Beck, RPR

<p style="text-align: right;">Page 22</p> <p>1 should include a ranking, you know? If you're  2 asking for 40, there's got to be 10 or 15 that  3 you most want, and the others that are kind of  4 second tier. And that's true for everybody.  5 That's the only way I'm going to get through  6 this and help you.  7       Comments?  8       MR. MOUGEY: Yes. I have a quick  9 -- a quick point of clarification. This is  10 Peter Mougey again.  11       On the prioritization and the fact  12 that we had refused, so this is where we need  13 your help. So we didn't refuse. What we were  14 asking for was a prioritization based on the  15 temporal scope of the time frame of the  16 custodial file. So if they have a custodial  17 file and it's six months, and it's in 2013 to  18 the pharmacy integrity team -- this is just an  19 example that they're offering -- began in 2012,  20 2013. So that's post.  21       So what we were looking for is,  22 what custodial files are available pre 2012 and  23 2013, and then we'll help prioritize. So I  24 think all of us -- meaning Plaintiffs and  25 Defendants -- would -- would -- to give us the</p>	<p style="text-align: right;">Page 24</p> <p>1 going to want them after all. So this might  2 help resolve some of the issue.  3       So I think it is appropriate for  4 the parties to ask about the nature of the  5 custodians and their files in the process of  6 this meet and confer, and that's obviously a  7 bilateral suggestion.  8       MS. SWIFT: David, this is Kate.  9       The only thing I need to add to  10 that, we're happy to talk about, you know, how  11 long folks have been at the company and that  12 sort of thing, but to determine how far back  13 somebody's custodial file goes you actually  14 have to collect and process the custodial  15 file --  16       SPECIAL MASTER COHEN: No. I think  17 you can get some good guesses. I think you can  18 make some good guesses.  19       MS. SWIFT: We'll do our best.  20       SPECIAL MASTER COHEN: I understand  21 that it ain't going to be perfect, but if you  22 know that someone has not been there -- you  23 know, began working there in 2012, then it's  24 unlikely that their custodial file is going to  25 retrieve anything earlier than that date.</p>
<p style="text-align: right;">Page 23</p> <p>1 tools to be able to prioritize -- because right  2 now we're playing pin the tail on the donkey.  3 We don't know -- we don't know who we're asking  4 for, time frame wise. We're saying; Well, tell  5 us when do you have the custodial files  6 available for us? I think if all of us will  7 endeavor to do that, that will all -- give us  8 all the tools to help kind of make some  9 intelligible decisions about when the custodial  10 file covered. Because as of right now, most of  11 us just have names. Sometimes we have titles.  12 But we don't even have time periods of titles,  13 and we don't have org charts.  14       So we're --  15       SPECIAL MASTER COHEN: Right. So I  16 agree with that. I agree that during this meet  17 and confer process that it's appropriate to ask  18 opposing parties about the nature of the  19 custodial file you had received. And I think  20 that actually that might help resolve this.  21       If -- if, for example, Plaintiffs  22 learn that out of the -- I'm just making this  23 up -- 40 custodians that they've asked for from  24 Walgreens, that 15 of them don't have any  25 documents prior to 2012, then maybe they're not</p>	<p style="text-align: right;">Page 25</p> <p>1       MR. SHEPPLE: This is Mark -- this  2 is Mark Shepple. I didn't want to cut this  3 conversation off, but it sounds like you're  4 done with Walgreens.  5       I was just going to say -- I was  6 going to talk about number five. I think the  7 good news is, what you just said probably kind  8 of puts that on the next week agenda. And I  9 think it's -- at least from our perspective --  10 it makes sense. There's a lot -- you know,  11 this is not one where I can say there's no  12 disagreement, frankly, because I think there  13 probably will be, but it is one that I fairly  14 confidently can say that both sides have some  15 interest in talking about this, getting more  16 clarity, getting more information. I don't  17 think it's ripe. I think its points are kind  18 of highlighted for now. But I think a few  19 days, as you suggested, will benefit us all.  20       And I think -- what I think the  21 protocol at least both sides seem to be asking  22 for at least is a few sentences or a little  23 more about what -- you know, what it is you  24 want, maybe a little description about who  25 these people are, why they're not appropriate.</p>